

# COHEN & GREEN

May 27, 2022

District Judge Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

By Electronic Filing.

**Re: Carol Lopez v. City of New York, et al., 20-cv-2502-LJL**

Dear Judge Liman:

My firm represents the Plaintiff in this matter. I write jointly with Defendants to ask for an extension of the current discovery schedule. This is the third such motion.

By way of background, the Court previously granted two extensions — and Defendants currently have a combination motion to dismiss and motion to stay *Monell* discovery pending. Plaintiff has not moved to compel *Monell* discovery in light of that motion, but no *Monell* discovery has been exchanged. Additionally, Plaintiff very recently had a knee surgery related to this incident, and the parties are in the process of obtaining and exchanging related records and releases.

With that background, we suggest that the Court enter a contingent extension — shifting the current discovery schedule out *sine die*, to be solidified based on the resolution of Defendants' motion to stay and dismiss. Following that order, the parties will quickly consult and file a proposed new schedule.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/ Pronouns: Mx., they/ their/ them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF and Email.